

United States District Court
District of Massachusetts

DOUGLAS G. GREER,

PLAINTIFF,

v.

**CITY OF SPRINGFIELD, JEFFREY M.
ASHER, JAMES F KERVICK, JAMES L.
SHEWCHUCK, JAMES M. MORIARTY,
JOHN DOES Nos. 1-4, JOHN DOE, No. 5,
and PAULA MEARA, CHIEF OF POLICE,**
DEFENDANTS.

CIVIL ACTION NO. 05-30001-MAP

**JOINT MOTION OF THE PARTIES TO ENLARGE THE TIME
PERIOD FOR FILING MOTION TO COMPEL AND OPPOSITIONS**

Plaintiff Douglas G. Greer and Defendants City of Springfield, Paula Meara, Jeffrey M. Asher, James F Kervick, James L. Shewchuck, and James M. Moriarty jointly move the Court to enlarge the time for plaintiff to file his Motion to Compel remaining non-expert discovery from February 9, 2007 to February 26, 2007 and the time for defendants to file any Opposition to the motion from March 2, 2007 to March 19, 2007.

As reasons for this motion, the parties state:

1. They have mediated this case and have continued to engage in settlement discussions. They have made significant progress and there is a real possibility that this case will settle;
2. If the case settles, additional motions and oppositions will become moot;
3. They would like to avoid expending time and financial resources preparing motions and oppositions that may not be necessary;
4. Granting this motion will not affect any other deadlines established by the Court; and
5. This motion would serve the interest of preserving judicial resources.

Wherefore, the parties respectfully request the Court to enlarge the period for the plaintiff to file his Motion to Compel non-expert discovery and for defendants to file oppositions.

Douglas G. Greer
By His Attorneys

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Respectfully submitted,
Defendants City of Springfield and
Paula Meara
By Their Attorney

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Edward M. Pikula
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Defendants Jeffrey M. Asher, James F
Kervick, James L. Shewchuck, and
James M. Moriarty

By Their Attorney

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Dated: February 7, 2007